

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
W.R. Grace & Co., <i>et al.</i> ,	:	Case No. 01-1139 (JKF)
	:	
Debtors.	:	Jointly Administered

**GENERAL INS. CO. OF AMERICA'S WITNESS
LIST FOR PHASE II OF THE CONFIRMATION HEARINGS**

General Insurance Company of America ("General Insurance"), by and through its undersigned counsel, hereby submits the following final list of witnesses that it may call to testify at the Phase II hearing to consider confirmation of the First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants' Representative, and the Official Committee of Equity Security Holders:

1. A Custodian of Records of General Insurance, if needed, for purposes of laying a foundation for admission of any General Insurance proof of claim, policies and the Settlement Agreement and Release between General Insurance and W.R. Grace & Co. - Conn., effective March 3, 1994, and of any other documents or records to be offered in Phase II.
2. Jeffrey M. Posner, Consultant and former Assistant Vice President, Director of Corporate Risk Management at W.R. Grace & Co., c/o David M. Bernick, Esq., Kirkland & Ellis LLP, 200 East Randolph Drive, Chicago, Illinois 60601.
3. Any other witness, if any, needed to establish authenticity and/or admissibility of exhibits.
4. All witnesses designated by any other party.
5. Any other party or individual deposed in connection with the plan confirmation proceedings.
6. Any witness necessary for impeachment or rebuttal.

Reservation of Rights Regarding Witness List

General Insurance reserves the right to call (i) any witness designated by any other party, regardless whether such witness is called by that party to testify, (ii) other witnesses who are not listed herein for the purpose of laying a foundation for the admission of document and evidence, to the extent necessary, (iii) other witnesses who are not listed herein to rebut any evidence or argument designated and/or offered by any party or to address any issue that may develop through the course of discovery, and (iv) other witnesses who are not listed herein for the purpose of impeachment. General Insurance also reserves its right to withdraw any designated witness. General Insurance further reserves the right to enter deposition testimony into the record in lieu of live testimony to the extent permitted by Rule 32 of the Federal Rules of Civil Procedure.

Dated: June 15, 2009

Respectfully submitted,

/s/ Frederick B. Rosner

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